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12 Attorneys for William Sorgen

13 IN THE UNITED STATES DISTRICT COURT

14 FOR THE NORTHERN DISTRICT OF CALIFORNIA

15 WILLIAM SORGEN,

16 Plaintiff,

17 vs.

18 The CITY AND COUNTY OF SAN  
19 FRANCISCO, San Francisco Police Chief  
20 HEATER FONG, San Francisco Police  
Officer BRIAN OLIVER (#776), and DOES  
1-20,

21 Defendants.

22 Case No. C-05-03172-TEH

23 **STIPULATION AND [PROPOSED]  
24 ORDER TO EXTEND DISCOVERY  
CUTOFF.**

25 The Parties, through their undersigned counsel, hereby stipulate and request that the  
26 Court extend the discovery cutoff date from July 3, 2006, to August 28, 2006.

27 The Parties agree that the extension of the discovery cutoff shall be for the limited  
28 purposes as follows:

- 29 1.) To complete the deposition of Defendant Brian Oliver.  
30 2.) To complete the deposition of percipient witness Dominic Campese.

3.) To complete Defendant's disclosures of items in Plaintiff's First Request for Production of Documents.

4.) To adjudicate the remaining discovery dispute concerning the Defendant's putative duty to disclose items requested in Plaintiff's First Request for Production of Documents number 28 (certain prior arrest reports of Brian Oliver).

The Parties agree that Good Cause exists for this extension and accordingly respectfully request the Court grant this petition.

Respectfully Submitted,

DATED: July 11, 2006

JOHN VIOLA  
BEN ROSENFELD

By:                   /S/  
**JOHN VIOLA**  
Attorneys for Plaintiff

DATED: July 11, 2006

DENNIS J. HERRERA  
City Attorney  
JOANNE HOEPER  
Chief Trial Deputy  
PETER J. KEITH  
Deputy City Attorneys

By: \_\_\_\_\_ /S/  
PETER J. KEITH  
Attorneys for Defendants

**PURSUANT TO STIPULATION, IT IS SO ORDERED** with the strict understanding that no other trial or pretrial dates shall be changed or modified as a result of this Order.

Dated: 07/17/06

